


BOXCAR MEDIA, LLC, and)	<u>CIVIL ACTION NO. 04-40051-NMG</u>
RACEWAY MEDIA, LLC,)	
)	
Plaintiffs,)	PROPOSED ORDER ON
v.)	JOINT MOTION FOR
)	ENTRY OF STIPULATED JUDGMENT
REDNECKJUNK, LLC,)	AND PERMANENT INJUNCTION
DR. THOMAS P. CONNELLY, and)	
CONNELLY RACING, INC.,)	
)	
Defendants.)	
)	

1. Judgment shall enter for the plaintiffs on their Complaint as follows:
- Defendants, together with their officers, directors, agents, successors, representatives and assigns, are hereby permanently enjoined from engaging in the following conduct:
- (a) marketing, advertising, displaying and/or otherwise promoting, and/or using as a business name, trade name and/or domain name, the names "redneckjunk," "redneckjunk.com," "rjunk," "rjunk.com," or any other name or mark containing the word "junk";
 - (b) marketing, advertising, displaying and/or otherwise promoting, and/or using as a business name, trade name and/or domain name, any name and/or mark confusingly similar to Plaintiffs' trademarks, which include "RacingJunk," "RacingJunk.com," "BoatingJunk," "BoatingJunk.com," "RvJunk" and "RvJunk.com";
 - (c) causing, facilitating, and/or encouraging third parties to advertise, to market, to display or otherwise to promote any name and/or mark whose use is prohibited to the Defendants under paragraphs (a) and/or (b) of this injunction, whether or not such third parties are compensated for the promotion of such name and/or mark; and

- (d) taking customer advertisements from Plaintiffs' web sites without prior permission from the customers at issue, and/or continuing to use customer advertisements taken from Plaintiffs' web sites without prior permission from the customers at issue.
- (e) Redneckjunk has, by notice to the Court, waived any and all rights of appeal from this judgment.

2. This Court shall retain jurisdiction over this matter and the parties for the purpose of enforcing and interpreting this injunction and judgment during and following the disposition of this civil action.

3. The bond deposited by Plaintiffs with the Court upon this Court's issuance of a preliminary injunction in the Plaintiffs' favor shall be returned to the Plaintiffs. Each party shall bear its own costs incurred in this action.



U.S.D.J.

Dated: 10/5/05